

Law Offices of Avrum J. Rosen, PLLC
38 New Street
Huntington, New York 11743
(631) 423-8527
Avrum J. Rosen, Esq.
Nico G. Pizzo, Esq.

Proposed Counsel for the Debtor and Debtor-In-Possession

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 11

FRALEG GROUP, INC.,

Case No.: 22-41410-jmm

Debtor.

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AFFIRMATION PURSUANT TO E.D.N.Y. LBR 9077-1

Avrum J. Rosen, an attorney duly admitted to practice before the Courts of the State of New York and before this Honorable Court, affirms the following to be true under the penalties of perjury, and states as follows:

1. I am a member of the Law Offices of Avrum J. Rosen, PLLC, counsel to Fraleg Group, Inc., the debtor and debtor-in-possession (the “Debtor”). I offer this affirmation pursuant to E.D.N.Y. LBR 9077-1 and Rule 9006(c) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) in support of the Debtor’s application seeking the entry of an Order directing a hearing on an expedited basis.

2. The Debtor submitted to this Court an application (“Application”) seeking an Order under sections 105 and 362 of Title 11 of the United States Code and the Court’s inherent power to enforce its orders and the mandates of the Bankruptcy Code: (i) enforcing the automatic stay with respect to the Lender’s¹ 9024 Motion to void the order of dismissal entered in the Dismissed

¹ All capital terms not defined herein shall have the same meaning as defined in the Debtor’s Application.

Bankruptcy case; (ii) granting the Debtor an award for damages against the Lender and its Counsel arising from violation of the automatic stay; and (iii) granting such other and further relief as this Court deems just and proper under the circumstances.

3. The Debtor seeks a hearing on the Application on an expedited basis due to the fact that there are several matters already set to be heard by this Court on August 17, 2022, which facts and relief are related to the Debtor's Application. Of the matters to be heard on August 17, 2022, the Lender's 9024 Motion is set. The Debtor's Application asserts that the Lender's 9024 Motion was the action that violated the stay, and seeks to enforce the automatic stay as to the Lender's 9024 Motion. Thus, it is reasonable that those matters should be heard together on August 17, 2022.

4. Additionally, the Debtor's Application seeks relief against the Lender and its Counsel, which are the parties that filed the applications set to be heard, and are expected to appear, on August 17, 2022. The hearing of the Debtor's Application on an expedited basis with the matters scheduled for August 17, 2022 is beneficial, both in reason and economics, to the parties and this Court because all matters will be heard together.

5. Therefore, the Debtor, under equity, seeks an expedited hearing in order to enforce the automatic stay with respect to the Lender's motion to void the order of dismissal entered in the Dismissed Bankruptcy.

6. Absent this immediate relief, the estate will be harmed because the Lender will continue to violate the stay at the detriment to the Debtor and its creditors.

7. Therefore, obtaining expedited approval of the Application for authority to enforce the automatic stay, and award the Debtor damages is material and critical to the estate and the Debtor's creditors.

8. It is for these reasons that the Debtor seeks an expedited hearing to consider the attached Application.

Dated: August 4, 2022
Huntington, New York

/s/ Avrum J. Rosen
Avrum J. Rosen